BURR & FORMAN LLP 420 North 20th Street Suite 3100 Birmingham, Alabama 35203 (205) 251-3000 Michael Leo Hall

UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11

DELPHI CORPORATION <u>et al.</u>, : Case No. 05-44481 (RDD)

Debtors. : (Jointly Administered)

<u>VERIFIED FEDERAL BANKRUPTCY RULE OF PROCEDURE 2019 STATEMENT OF BURR & FORMAN LLP</u>

Pursuant to Federal Rule of Bankruptcy Procedure 2019, Burr & Forman LLP ("Burr & Forman") submits this verified statement and represents as follows:

- 1. Burr & Forman LLP currently represents the following creditors and parties-ininterest in the above-styled case:
 - (a) Mercedes-Benz U.S. International, Inc. ("MBUSI") 1 Mercedes Drive Vance, AL 35490
 - (b) Hyundai Motor Manufacturing of Alabama, Inc. ("Hyundai")700 Hyundai Blvd.Montgomery, AL 36105
 - (c) Citation Corporation ("Citation")
 2700 Corporate Drive
 Suite 100
 Birmingham, AL 35242
 - (d) Futaba Corporation of America ("FCA") 2865 Wall Triana Hwy. Huntsville, AL 35824

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2. Citation and Futaba are both suppliers to one or more of the Debtors. Citation and

its affiliates are owed in excess of \$1,400,000 for goods shipped to the Debtors pre-petition.

FCA and its affiliates are owed in excess of \$6,600,000 for goods shipped to the Debtors pre-

petition.

3. MBUSI and Hyundai are both customers of one or more of the Debtors. MBUSI

and Hyundai may hold rights of setoff against the Debtors.

4. Burr & Forman is representing each of the listed parties-in-interest individually in

the Debtors' cases; the clients do not compromise a committee.

5. Burr & Forman has no written contracts with the entities described in paragraph 1,

other than ordinary retainer/engagement letters.

6. Burr & Forman does not hold any claim against, or equity interest in, the Debtors.

7. Burr & Forman hereby expressly reserves the right to supplement and/or amend

this statement in any respect.

I verify under penalty of perjury that the foregoing is true and correct.

Dated: Birmingham, Alabama

October 24, 2005

BURR & FORMAN LLP

By:/s/ Michael Leo Hall

Michael Leo Hall (pro hac vice motion

pending)

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document on the following parties via electronic-mail or facsimile, and on all parties receiving electronic notice via the ECF system, on this the 24th day of October, 2005:

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> /s/ Michael Leo Hall OF COUNSEL

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